

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

Civil No.: 19-CV-484-PP

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

DECLARATION OF DANIELLE RODRIGUEZ

I, Danielle Rodriguez, swear as follows:

1. I am over 18 years old and have personal knowledge regarding the facts set forth in this Declaration. If called to testify, I could and would testify competently regarding the facts recited herein.

2. I am employed by R.C. Baral & Company Inc., which also employs Tal Benari.

3. My job duties include filling in as a receptionist when the firm's primary receptionist is at lunch or taking a break. While I am working as the receptionist, I am seated behind a counter in a waiting area that is open to the public. Two doors leading from the waiting area to the interior offices are kept closed.

4. My duties as receptionist include answering telephone calls; greeting visitors; and notifying others who work in the office suite that visitors have arrived. When I am working as the receptionist, while I am authorized to accept routine deliveries on behalf of the company, I

am not authorized to accept service of process, either on behalf of the company or on behalf of anyone who works there. I am not the person in charge of the office.

5. I was working as the fill-in receptionist during the lunch hour on March 12, 2019. During that time, a man entered the waiting area while I was taking a telephone call. When that call ended, the visitor asked for Mr. Benari. I told him truthfully that Mr. Benari was not in his office.

6. Immediately after I told the man Mr. Benari was not in, I had to answer another telephone call. While I was taking that call, the visitor placed a set of documents on the reception desk and left. I do not recall him giving his name or saying anything else. He did not leave a business card.

7. When I looked at the documents, they appeared to include a summons for the lawsuit by Andrew Colborn against Chrome Media and others.

8. Because Mr. Benari was not in his office at the time, I placed the documents on his desk.

Pursuant to 18 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 20th day of April 2019.


Danielle Rodriguez